Supreme Court, U.S.
FILED
DEC 18 1996
CLERK

No. 96-749

In The

Supreme Court of the United States

October Term, 1996

LARRY HARDY,

Petitioner,

versus

DEPARTMENT OF SOCIAL SERVICE, STATE OF LOUISIANA, DISTRICT ATTORNEY'S OFFICE FOR THE PARISH OF AMITE, AND DIANNE OSBY,

Respondents.

On Petition For Writ Of Certiorari To The United States Court Of Appeals For The Fifth Circuit

BRIEF IN OPPOSITION

DUNCAN S. KEMP, III
21st Judicial District Attorney
Post Office Drawer 639
Amite, Louisiana 70422
Telephone: 1-800-572-0083

Attorney for Respondents

COCKLE LAW BRIEF PRINTING CO., (800) 225-6964
OR CALL COLLECT (402) 342-2831

TABLE OF CONTENTS

Page

TABLE OF CONTENTS i

TABLE OF AUTHORITIES ii

STATEMENT OF THE CASE 1

SUMMARY OF THE ARGUMENT 2

ARGUMENT 4

CONCLUSION 16

TABLE OF AUTHORITIES

Page

CASES:

Didier v. Fasola, 597 So.2d 450 (La. App. 1 Cir. 1991) 11

Golde v. Zwickler, 394 U.S. 103, 89 S.Ct. 956, 22 L.Ed.2d 113 (1969) 7

Griswold v. Connecticut, 381 U.S. 479, 85 S.Ct. 1678, 14 L.Ed.2d 510 (1965) 6, 8

Landry v. Robertson Advertising Svc., Inc., 660 So.2d 194 (La. App. 4 Cir. 1995) 15

Little v. Streater, 452 U.S. 1, 101 S.Ct. 2202, 68 L.Ed.2d 627 (1981) 12, 13

McMullen v. McMullen, 594 So.2d 926 (La. App. 3 Cir. 1992) 11

Roe v. Wade, 410 U.S. 113, 93 S.Ct. 705, 35 L.Ed.2d 147 (1973) 4

SEC v. Medical Committee for Human Rights, 404 U.S. 403, 92 S.Ct. 577, 30 L.Ed.2d 560 (1972) 7

Schmerber v. California, 384 U.S. 757, 86 S.Ct. 1826, 16 L.Ed.2d 908 (1966) 8, 12

Skinner v. Oklahoma, 316 U.S. 535, 62 S.Ct. 1110, 86 L.Ed. 1655 (1942) 5

Stanley v. Georgia, 394 U.S. 557, 89 S.Ct. 1243, 22 L.Ed.2d 542 (1969) 4, 13

State v. McHugh, 630 So.2d 1259 (La. 1994) 8

State v. W.A.S., 629 So.2d 1209 (La. App. 1 Cir. 1993) 12

State of Louisiana, In Interest of A.C., 643 So.2d 719 (La. 1994) 8

TABLE OF AUTHORITIES – Continued

Page

State of Louisiana, In Interest of J.M., 590 So.2d 565 (La. 1991) 9, 10, 11, 12

U.S. v. Munsingwear, Inc., 340 U.S. 36, 71 S.Ct. 104, 95 L.Ed. 36 (1950) 7

STATUTES:

LSA-R.S. 9:305 14

LSA R.S. 9:396 ..... 7, 9, 10, 11, 17

STATEMENT OF THE CASE

Defendant-respondent, the State of Louisiana, through the Twenty-First Judicial District Attorney, Duncan S. Kemp, III, has been incorrectly referred to in the Petition for Writ of Certiorari as "District Attorney's Office for the Parish of Amite".

Dianne Osby applied to the State of Louisiana for financial assistance for her minor child. Ms. Osby named the father as being "Larry Hardy." Subsequently, civil proceedings commenced in the Twenty-First Judicial District Court by way of a petition to establish paternity and support. Subsequent thereto, the petitioner now before this Court, Larry Hardy, was ordered to appear and show cause, if any he had, why he should not be ordered to prove paternity. In open court on or about August 18, 1995, Dianne Osby disavowed paternity by Larry Hardy when she stated that petitioner was not the same "Larry Hardy" with whom she had engaged in sexual intercourse and, thus, the Mr. Hardy who was present in court was not the father of her child. Immediately upon disavowal, the state court dismissed the petition to establish paternity and support.

The petitioner then sought a declaratory judgment in the United States District Court, Eastern District of Louisiana, declaring Louisiana Revised Statute 9:396 unconstitutional, and further seeking to declare that a woman's unilateral right to choose whether to abort or give birth to a child is unconstitutional. On December 18, 1995, judgment was entered by the United States District Court, Eastern District of Louisiana, denying declaratory judgment and dismissing petitioner's claim for defamation.

The petitioner then appealed to the United States Court of Appeal, Fifth Circuit. On or about August 12, 1996, the Fifth Circuit affirmed the lower court's ruling.

It is upon said ruling that petitioner, Larry Hardy, now seeks review by this Honorable Court.

SUMMARY OF THE ARGUMENT

Larry Hardy claims that women have more rights than men in deciding whether to abort or give birth to a child. He also urges that consensual sex is not consensual procreation.

Constitutionally protected liberty includes freedom from governmental interference with intensely personal decisions (such as whether or not to give birth to a child). To enact legislation that would give the father of an unborn child the right to decide whether or not that child would be born, would grossly violate the constitutional rights of the mother. Furthermore, the State of Louisiana has a compelling interest in the welfare of its children, especially when mothers require financial assistance to care for their children. To say that a woman should be compelled under any circumstances to abort her child, and more so because the father of that child refuses or is unable to pay child support, would be manifest error and violative of a woman's basic civil rights.

On the other hand, where ordering an individual to submit to blood testing to determine paternity (for the collection of child support) serves a special governmental need outside of the ordinary law enforcement context,

such an infringement upon that right is justified by regulations which have been adopted to serve compelling state interests and cannot be otherwise achieved through means significantly less restrictive of privacy freedoms. The long established standard of the "best interest of the child" far outweighs an alleged father's right to privacy against intrusions by mandated blood testing. Thus, the statutes requiring such tests do not violate due process.

Proceedings to establish paternity are civil in nature. Mr. Hardy complains that putative fathers should be provided free legal representation when being compelled to prove paternity. While it is true that an accused has the right to an attorney at all stages of prosecution, Mr. Hardy was not accused of an indictable crime. Furthermore, he was not even found to be the father of Ms. Osby's child. Upon being served with the petition for paternity and the order to show cause, a prudent man, while knowing that paternity was an impossibility, could conceivably pick up a telephone and call the District Attorney's office to inquire into the matter further. By providing proof of identification, or a copy of his Louisiana driver's license, Mr. Hardy could have hastened his dismissal from those proceedings since it was another "Larry Hardy" who had fathered Ms. Osby's child.

Petitioner alleges defamation, but fails to set forth the **specific manner** in which he claims to have been defamed, as well as any **resultant injury** he may have sustained. To merely state that the paternity proceedings put a strain on petitioner's marriage does not meet the essential elements required to make a showing of defamation and slander.

ARGUMENT

I. Petitioner asserts that a woman's right to choose whether to abort or bear a child infringes on a man's "constitutional" right to choose whether or not to procreate, thus, resulting in unequal treatment of the law and abuse in the area of child support.

The petitioner candidly states his belief that a woman's constitutionally protected rights allow her the power of life or death of an unborn child and, thus, those protected rights infringe upon a man's right to choose whether or not to procreate. While claiming this issue is ripe for review, petitioner attacks this Court's ruling in *Roe v. Wade*, 410 U.S. 113, 93 S.Ct. 705, 35 L.Ed.2d 147 (1973), by summarily arguing that women have more rights than men in deciding whether to abort or bear a child, "**even though the male participated in consensual sex and not consensual procreation**".

This moral issue is perhaps as old as time itself, and it could be said that every human being is confronted, at some point in their lifetime, with making a personal choice of whether to engage in consensual sexual intercourse outside the bonds of matrimony. An individual's constitutionally protected interest in his mind, thoughts and mental processes has been recognized by this Court prior to the adoption of the Louisiana Constitution. The operations of the mind are absolutely beyond the power of government to control. *See Stanley v. Georgia*, 394 U.S. 557, 565-66, 89 S.Ct. 1243, 1248-49, 22 L.Ed.2d 542 (1969). Engaging in consensual sexual intercourse is an exercise of free will, and each member of the human race should be prepared to undertake all responsibilities which derive

from the very act to which they consented to perform. Reasonable minds must agree that individuals assume moral and legal responsibility for their voluntary actions, particularly when engaging in consensual sexual intercourse, knowing the possibility of pregnancy, which may later become obligatory in nature. Oftentimes legal obligations attach to choices of free will.

Simply stated, petitioner takes issue with the rights that allow a woman alone to decide whether to abort or bear a conceived child. Constitutionally protected liberty includes freedom from governmental disclosure or interference with certain kinds of intensely personal decisions. *Skinner v. Oklahoma,* 316 U.S. 535, 541-542, 62 S.Ct. 1110, 1113-14, 86 L.Ed. 1655 (1942). To enact legislation which would enable a man to decide when or if a woman should abort an unborn child would run afoul of the equal protection clause. While addressing the constitutionality of Oklahoma's Habitual Criminal Sterilization Act, this Court held in *Skinner, supra,* that:

> "We are dealing here with legislation which involves one of the basic civil rights of man. Marriage and procreation are fundamental to the very existence and survival of the race. The power to sterilize, if exercised, may have subtle, far-reaching and devastating effects. . . .There is no redemption for the individual whom the law touches. . . .When the law lays an unequal hand on those who have committed intrinsically the same quality of offense and sterilizes one and not the other, it has made as an invidious a discrimination as if it had selected a particular race or nationality for oppressive treatment. . . . " *Skinner* at 541.

Hypothetically, applying this standard to legislatively enforced abortion enacted solely for the purpose of allowing a man an equal choice in abortion or childbearing would be invidious discrimination and offers no redemption for that woman and her unborn child. Such legislation would violate the most sacred right to be left alone from governmental intrusion, that being a woman's right to have offspring. Furthermore, the law would be unequal to other individuals found in the same circumstances, where another man may choose not to compel a woman to abort an unborn child. Such a statute would invade a woman's right to personal liberty, (embodied in the Due Process Clause of the Fourteenth Amendment), as well as the right to personal, marital, familial, and sexual privacy that is protected by the Bill of Rights and its penumbras, and rights reserved by the Ninth Amendment. *See Griswold v. Connecticut*, 381 U.S. 479, 85 S.Ct. 1678, 14 L.Ed.2d 510 (1965).

Clearly, there is no merit to petitioner's claim of discrimination and unequal treatment.

II. Petitioner alleges that Louisiana Statutes Annotated – Revised Statute 9:396 (Paternity Act) violates petitioner's right to privacy, where a woman's right to bear a child forces an obligation upon the man.

The petitioner claims that his right to privacy was "implicated". The respondent avers that petitioner's right to privacy was not breached. Larry Hardy was not required to submit to blood testing, thus, no obligation to pay child support was forced upon him. The usual rule in

federal cases is that an actual controversy must exist at stages of appellate or certiorari review, and not simply at the date the action is initiated. *United States v. Munsingwear, Inc.*, 340 U.S. 36, 71 S.Ct. 104, 95 L.Ed. 36 (1950); *Golden v. Zwickler*, 394 U.S. 103, 89 S.Ct. 956, 22 L.Ed.2d 113 (1969); *SEC v. Medical Committee for Human Rights*, 404 U.S. 403, 92 S.Ct. 577, 30 L.Ed.2d 560 (1972). The state court proceedings to establish paternity were immediately dismissed against Larry Hardy when Ms. Osby declared in open court that Mr. Hardy was not the father of her child. That disavowal of paternity rendered petitioner's case moot. The possibility of repetition is so remote as to render Larry Hardy without standing to undertake this litigation.

The petitioner claims that an ex parte order to submit to blood testing invaded petitioner's right to privacy, and he premises that claim by alleging unconstitutionality of the method by which a putative father can be compelled to submit to blood testing for a determination of paternity. Mr. Hardy further complains that if the man is determined to be the father of the child, then he owes financial support to the child and, thus, a responsibility has been placed upon him because of a woman's decision to bear the child instead of aborting. The legal and moral obligation of financially supporting a child should be of tantamount concern not only to the parents, but to the state and community in which that child lives. The Louisiana Legislature has recognized this obligation and has provided for the welfare of its children by enacting legislation such as Louisiana Revised Statute 9:396.

Of greater significance, this petitioner was not compelled to submit to blood testing when this matter came

on for hearing at the state court level. He merely argues that the method set forth under Louisiana Revised Statute 9:396 is unconstitutional.

The right to privacy is not absolute. In most criminal cases, the permissibility of a particular intrusion depends on the prerequisite of probable cause and a warrant, or the existence of an established exception to these requirements. Where a privacy right intrusion is sufficiently less intrusive than an arrest and serves special governmental needs outside of the ordinary law enforcement context, such an infringement on that right may be justified by regulations adopted to serve compelling state interests that cannot be achieved through means significantly less restrictive of privacy freedoms. *See State v. McHugh*, 630 So.2d 1259 (La. 1994); *citing State v. Perry*, 610 So.2d 746 (La. 1992); *Griswold v. Connecticut*, 381 U.S. 479, 85 S.Ct. 1678, 14 L.Ed.2d 510 (1965). Certain governmental invasions have been treated as intrusions of a protected interest of privacy, although they eventually were upheld on a showing of clear necessity, procedural regularity, and lack of risk, trauma or pain to the individual, as in the instant matter. *Schmerber v. California*, 384 U.S. 757, 86 S.Ct. 1826, 16 L.Ed.2d 908 (1966).

In *State of Louisiana, In Interest of A.C.*, 643 So.2d 719 (La. 1994), the Louisiana Supreme Court, while addressing constitutionality, held that:

> "When a court finds a reasonable way to do so, 'it must construe a statute so as to preserve its constitutionality.' ***The means to do so can be obtained from the text of the statute itself.***" (emphasis added)

The constitutionality of Louisiana Revised Statute 9:396 was specifically addressed by the Louisiana Supreme Court in *In the Interest of J.M.*, 590 So.2d 565 (La. 1991). In that case, the mother of a minor child filed a paternity action against both her former husband, to whom she was married but separated from at the time of the child's conception, and "Mr. Z.", with whom she had allegedly had an exclusive sexual relationship near the time of conception. During the course of the lawsuit, the mother of the child requested that the court order blood testing of the defendants. In response, Mr. Z filed a motion for declaratory judgment regarding the constitutionality of the statute, resulting in a ruling by the trial court declaring LSA-R.S. 9:396 unconstitutional. In reversing that ruling, the Louisiana Supreme Court held:

> "A court order for blood testing to determine paternity is . . . a search and seizure within the meaning of the Fourth Amendment. . . . [T]he question at issue . . . is whether a court ordered blood test is reasonable and justified under the circumstances.
>
> A blood test is minimally intrusive, relatively painless, and medically safe. In facilitating a determination of paternity, blood tests are highly reliable and unequaled in evidentiary value."

Although an alleged father has a right to privacy and to be free from unreasonable searches and seizures, "those rights are not absolute and may be reasonably regulated when the State has a sufficiently weighty interest" because of its concern for the welfare of its children and in the interest of conservation of the State's public assistance funds. A minor child has a right to support

from its parents, and when public assistance has been requested by a mother, there exists a duty to determine the issue of paternity for enforcement of child support. *In the Interest of J.M., supra.*

In the instant matter, Dianne Osby, the mother of the minor child, provided the State of Louisiana with the name of "Larry Hardy" as being the father of her child. Upon being notified of the paternity proceedings, Mr. Hardy could have simply provided a copy of his Louisiana driver's license to correctly identify himself, which would have further hastened his discharge from the proceedings. However, he failed to do so. Ultimately, Mr. Hardy was ordered to show cause why he should not be compelled to submit to blood testing for the establishment of paternity in the matter of *State of Louisiana, in the Interest of Dianne Osby v. Larry Hardy,* Twenty-First Judicial District Court, Tangipahoa Parish, State of Louisiana, Docket Number 9501317. Mr. Hardy appeared before the trial court on the appointed date. However, when Dianne Osby was asked if the father of her child was in the courtroom, she replied no. The proceedings were then dismissed against Mr. Hardy *prior to his being ordered to submit to a blood test.* By compelling Larry Hardy to appear at the rule to show cause, the District Attorney's office was assisting the State in attempting to establish paternity as provided for in LSA-R.S. 9:396, which states:

> "The district attorney, in assisting the Department of Social Services in establishing paternity as authorized by R.S. 46:236.1, may file a motion with a court of proper jurisdiction and venue prior to and without the necessity of filing any other legal proceeding. Upon ex parte motion of

> the district attorney and sworn affidavit of the party alleging specific facts tending to prove paternity and other facts necessary to establish the jurisdiction and venue of the court, the court shall issue an ex parte order directing the mother, child, and alleged father to appear at a certain date and time to submit to the collection of blood or tissue samples, . . . "

As noted by the Third Circuit Court of Appeal in *McMullen v. McMullen*, 594 So.2d 926 (La. App. 3 Cir. 1992), the admission of a mother that a certain man was not the father of her child would have sufficient evidentiary force to establish a disavowal of paternity, as was the case in the instant matter.

Petitioner asserts that Louisiana Revised Statute is in direct violation of his right to privacy and equal protection afforded by the United States Constitution and its penumbras, as well as the Louisiana Constitution. LSA-R.S. 9:396 does not violate a putative father's equal protection rights where the establishment of paternity and conservation of public assistance funds are important governmental objectives. *In Interest of J.M., supra.*

The State's interest in establishing paternity through reliable, scientific methods outweighs an alleged father's right to privacy against intrusions by mandated blood test, so that statutes requiring such tests do not violate due process. *Didier v. Fasola*, 597 So.2d 450 (La. App. 1 Cir. 1991). Furthermore, the requirement of blood tests in proceedings in which paternity is an issue does not constitute an **unreasonable search and seizure**. *Didier, supra.*

The Fourth Amendment to the United States Constitution provides individuals with protection from unreasonable searches and seizures. In *Schmerber v. California*, 384 U.S. 757, 86 S.Ct. 1826, 16 L.Ed.2d 908 (1966), the Supreme Court held that the drawing of blood for DWI blood testing did not infringe upon Fourth Amendment rights, and held:

> " . . . the Fourth Amendment's proper function is to constrain, not against all intrusions as such, but against intrusions which are not justified in the circumstances, or which are made in an improper manner."

In *State of Louisiana v. W.A.S.*, 629 So.2d 1209 (La. App. 1 Cir. 1993), the First Circuit Court of Appeal opined that:

> "Because of the strong societal interest in the determination of parentage of minor children and the minimal intrusion involved, we find that court-ordered blood testing in paternity cases is constitutionally permissible if justified under the circumstances of the particular case. La. R.S. 9:396 is reasonably construed by this [c]ourt to require a proper showing in a show cause hearing before issuance of an order for compulsory blood testing. The statute is therefore not unconstitutional, because, so construed, it does not violate the prohibition against unreasonable searches and seizures under the Fourth Amendment of the United States Constitution or Article I, Section 5 of the 1975 Louisiana Constitution. . . . " [*See In the Interest of J.M.*, 590 So.2d at 567 568, 570, 572.] [emphasis added]

The value of blood grouping tests in paternity cases is well established. In *Little v. Streater*, 452 U.S. 1, 101 S.Ct.

2202, 68 L.Ed.2d 627 (1981), the Court declared the required blood grouping tests to be made available to indigent defendants in view of the unique quality of these tests as a source of evidence. When paternity is an issue, the use of blood tests provides the court and all parties with "a wholesome aid in the quest for truth. . . . Their reliability as an indicator of the truth has been fully established." *Little v. Streater,* 101 S.Ct. at 2207. In addition, the pervasive "best interest of the child" standard encourages the use of the most reliable and accurate means for identifying the truth in contested paternity suits. Blood grouping tests supply the courts and the parties with just such information. The intrusion to a party to undergo testing is justified in the given circumstances of paternity cases.

In the instant matter, Larry Hardy was not ultimately required to submit to blood testing. Therefore, a disavowal was not required.

The petitioner further asserts that a woman's unilateral right to choose to bear a child infringes upon a man's right to procreate and, thus, is unconstitutional. An individual's constitutionally protected interest in his mind, thoughts and mental processes was also recognized by the United States Supreme Court prior to the adoption of the Louisiana Constitution. The operations of the mind are absolutely beyond the power of government to control. *See Stanley v. Georgia,* 394 U.S. 557, 565 66, 89 S.Ct. 1243, 1248-49, 22 L.Ed.2d 542 (1969).

It is clear from the present case that application of the statutory scheme (1) furthers the State's compelling interests in determination of paternity, (2) serves a special

governmental need outside the ordinary law enforcement context, and (3) requires only a slight intrusive impact consisting of interference sufficiently less invasive than an arrest. The State's compelling and special objectives, *i.e.*, the welfare of a minor child, cannot be achieved through means significantly less restrictive of privacy freedoms.

III. Petitioner urges a violation of equal protection where a woman is afforded an attorney to represent her "free of charge" in a paternity action initiated by the State, but the putative father is not afforded an attorney.

The petitioner claims his rights have been further violated because putative fathers are not provided with free legal representation when appearing in court to avow or disavow paternity. When a paternity action is commenced for the sole purpose of determining the proper payor in child support cases, the State initiates proceedings in the interest of the mother and child, which are civil in nature. If the husband, or legal father who is presumed to be the father of the child, who because of misrepresentation, fraud, or deception by the mother, erroneously believed that he was the father of the child, then the time for filing suit for disavowal of paternity shall be suspended during the period of such erroneous belief, or for ten years, whichever ends first. Louisiana Revised Statute 9:305. Simply stated, a man erroneously believed to be the father of a child in paternity proceedings has recourse in the nature of civil proceedings. Failure to provide a putative father with legal counsel at the time of his appearance in court to avow or disavow

paternity is not a violation of petitioner's constitutional rights.

In civil proceedings, an indigent party may petition the court to proceed *in forma pauperis*. Likewise, in criminal proceedings, the State of Louisiana provides a method by which indigent defendants may receive legal representation. However, to state that a putative father should be provided free legal representation at the time he appears in court to avow or disavow paternity would clearly be an abuse of the legal system.

IV. Did the lower courts err in dismissing petitioner's defamation claim?

The petitioner's final issues of whether the lower court erred in dismissing his defamation complaint, and whether false accusation of paternity is defamation and actionable per se, are moot. To prove defamation, Larry Hardy must prove (1) defamatory words, (2) publication, (3) falsity, (4) malice, actual or implied, and (5) resultant injury. *Landry v. Robertson Advertising Service, Inc.*, 660 So.2d 194 (La. App. 4 Cir. 1995).

In his brief, Mr. Hardy eloquently defines defamation, libel and slander, and specifically raises the question of whether false statements of paternity are defamatory. He goes on to say that the statement of petition to establish paternity is libelous. The phrase "if the offense is indictable", as used by petitioner, is the key to this issue. The State of Louisiana does not consider adultery, fornication, or paternity as crimes committed against the State. Thus, paternity is not an indictable offense, but is civil in nature.

Ms. Osby named "Larry Hardy" as being the father of her child. When Mr. Hardy, the petitioner herein, appeared in court at the show cause hearing, the court was informed by Ms. Osby that Mr. Hardy was **not one and the same Larry Hardy who fathered her child**. The proceedings were then dismissed against petitioner.

While it may be true that a strain was placed on petitioner's marriage as a result of the petition to establish paternity, the petitioner has failed to make a showing of the necessary elements of defamation and slander.

CONCLUSION

No actual controversy exists at this time. Mr. Hardy was properly dismissed from further proceedings when Ms. Osby informed the state court that he was not the father of her child. Thus, petitioner's claims are now moot.

There is no merit to petitioner's claim of discrimination and unequal treatment where a woman has the right to decide whether to abort or give birth to a child. To legislatively enact statutes for the sole purpose of giving a father an **equal** choice in deciding whether a woman should abort a child or give birth would be a gross deviation from the rights guaranteed that woman by the United States Constitution and its penumbras.

The petitioner fails to demonstrate any abuse by the State of Louisiana in legislatively enacting a statute that provides for the support of its minor children. In fact, Mr.

Hardy completely fails to demonstrate how he has sustained irreparable injury by defamation and slander because of Louisiana Revised Statute 9:396. The state court proceedings against petitioner were properly dismissed immediately upon confirmation by Dianne Osby that petitioner was not the same "Larry Hardy" who fathered her child.

Based upon the foregoing, respondent respectfully prays that this Honorable Court deny the Petition for Writ of Certiorari, and the lower courts' rulings previously rendered be affirmed.

Respectfully submitted,

21st Judicial District
Attorney

DUNCAN S. KEMP, III
District Attorney
Post Office Drawer 639
Amite, Louisiana 70422
Telephone: 1.800-572-0083

Attorney for Respondents